

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

DENY MITROVICH

No. 18 CR 789

Judge Gary Feinerman

**GOVERNMENT'S UNOPPOSED MOTION
FOR EXTENSION OF TIME**

The UNITED STATES OF AMERICA, by JOHN R. LAUSCH, JR., United States Attorney for the Northern District of Illinois, respectfully moves to extend the deadline for production of discovery by 14 days, and in support thereof states the following:

1. On April 3, 2020, this Court granted defendant's motion to compel, and directed the government to produce the responsive discovery by May 28, 2020. *See* Dkt. No. 72.

2. The government has been working diligently toward that end. However, due to the COVID-19 pandemic, physical access to the FBI office where the document searches must be performed, has been restricted.

3. As a result, about 350 pages of documents, plus additional materials, which may be responsive to the discovery requests were provided to the assigned attorney for review only recently. Further, additional documents may be retrieved pursuant to continued searching, which would require additional review.

4. As such, the government requests that the deadline for its production of discovery be extended by 14 days, to and including June 11, 2020.

5. The government has conferred with defense counsel and there is no objection to this request.

WHEREFORE, the government respectfully requests that the deadline for its production of discovery be extended by 14 days, to and including June 11, 2020.

Dated: May 21, 2020

Respectfully Submitted,

JOHN R. LAUSCH, JR.
United States Attorney

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